

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

**FORWARD, INCORPORATED
FORWARD LANDFILL**

FINAL ENGINEERING EVALUATION

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MSWL (EG) APPLICATION REVIEW

Project #: 990167	
Deemed Complete: March 2, 1999	
Engineer: Douglas Shaffer	
Date: May 1, 2002	
Facility Number:	N-339
Facility Name:	Forward, Inc.
Mailing Address:	1145 W Charter Way Stockton, CA 95206
Contact Name:	Curt Fujii
Phone:	(925) 458 9800
Responsible Official:	Lawrence Butch Stefani
Title:	Landfill Operations Manager

I. PROPOSAL

The [Forward, Inc.](#) is proposing that an Initial Title V permit be issued for its [Forward Landfill](#) facility in the [County of San Joaquin](#). The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

II. FACILITY LOCATION

[Forward Landfill](#) is located at [9999 S. Austin Road, Manteca, CA](#).

III. EQUIPMENT LISTING

A detailed facility printout is provided in Attachment A.

A summary of the exempt equipment categories, which describe the insignificant activities or equipment at the facility not requiring a permit, is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit Templates:

A. SJV-GS-2-0 Gasoline Transfer Systems Equipped with Phase I Vapor Recovery

The applicant has requested to utilize template SJV-GS-2-0 for unit 0339-9. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

B. SJV-IC-1-0 Series 1 Internal Combustion Engines

The applicant has requested to utilize template SJV-IC-1-0 for unit 0339-11. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Operating Permit are based on general permit templates that have been previously subject to EPA and public review. The terms and conditions from the general permit templates are included in the proposed permit and are not subject to further EPA or public review.

For permit applications utilizing general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for general permit template, applicable requirements not covered by the general permit template, and the applicable procedural requirements for issuance of Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from general permit templates and are not subject to further EPA and Public review:

Conditions 1 through 12 of the requirements for permit N-0339-9

Conditions 1 through 11 of the requirements for permit N-0339-11

VI. APPLICABLE REQUIREMENTS ADDRESSED BY PERMIT TEMPLATES

District Rule 2520 Operational, Monitoring and Record Keeping Requirements, and Permit Shields (Adopted June 15, 1995)¹, Sections 9.1, 9.4.2, 9.5.2, 13.2

District Rule 2520 Periodic Monitoring and Record Keeping (Adopted June 15, 1995)²

District Rule 4201 Particulate Matter Concentration (Amended December 17, 1992)², Section 3.1

District Rule 4621 Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants (Amended June 18, 1998)¹, except Section 5.2.2

District Rule 4622 Transfer of Gasoline into Vehicle Fuel Tanks (Amended June 18, 1998)¹, Section 6.1

District Rule 4623 Storage of Organic Liquids (Amended December 17, 1992)¹, Section 5.4

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY PERMIT TEMPLATES

District New and Modified Stationary Source Review Rule

District Rule 1100 Equipment Breakdown (Amended December 17, 1992) (Non SIP replacement for San Joaquin County Rule 110)

¹ General Permit Template SJV-GS-2-0 addressed this requirement only for the unit(s) identified in Section IV, Part C.

² General Permit Template SJV-IC-1-0 addressed this requirement only for the unit(s) identified in Section IV, Part D.

District Rule 1160 Emission Statements (Adopted November 18, 1992)

District Rule 2010 Permits Required (Amended December 17, 1992)

District Rule 2020 Exemptions (Amended July 21, 1994) (Non SIP replacement for San Joaquin County Rule 202)

District Rule 2031 Transfer of Permits (Amended December 17, 1992)

District Rule 2040 Applications (Amended December 17, 1992)

District Rule 2070 Standards for Granting Applications (Amended December 17, 1992)

District Rule 2080 Conditional Approval (Amended December 17, 1992)

District Rule 2520 Federally Mandated Operating Permits (Amended June 21, 2001), Sections 5.2, 9.3.1, 9.3.2, 9.4.1, 9.4.2, 9.5.1, 9.5.2, 9.7, 9.8.2, 9.8.3, 9.8.4, 9.8.5, 9.9, 9.12, 9.13.1, 9.13.2, 9.14, 9.16 and 10.0

District Rule 4101 Visible Emissions (Amended December 17, 1992) (Non SIP replacement for San Joaquin County Rule 401)

District Rule 4301 Fuel Burning Equipment (Amended December 17, 1992)

District Rule 4601 Architectural Coatings (Amended December 17, 1992)

District Rule 8020 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Construction, Demolition, Excavation, and Extraction Activities (Amended April 25, 1996)

District Rule 8030 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Handling and Storage of Bulk Materials (Amended April 25, 1996)

District Rule 8040 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Landfill Disposal Sites (Amended April 25, 1996)

District Rule 8060 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Paved and Unpaved Roads (Amended April 25, 1996)

District Rule 8070 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Vehicle and/or Equipment Parking, Shipping, Receiving, Transfer, Fueling, and Service Areas (Amended April 25, 1996)

40 CFR Part 60 Subpart Cc Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills...

40 CFR Part 60 Subpart WWW Standards of Performance for Municipal Solid Waste Landfills

40 CFR Part 61 Subpart M National Emission Standard for Asbestos

40 CFR Part 62 Subpart GGG Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction Prior to May 30, 1991 and Have Not Been Modified or Reconstructed Since May 30, 1991

40 CFR Part 82 Subpart F Stratospheric Ozone

40 CFR Part 89 Subpart A Control of Emissions From New and In-Use Nonroad Engines

VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Federally Enforceable requirements. The terms and conditions that are part of the facility's Federally Enforceable requirements will be, upon approval into the state plan and administrative conversion, designated as "Federally Enforceable Through Title V Permit."

This facility is subject to the following rules that are not currently federally enforceable:

District Rule 4102 Nuisance (Amended December 17, 1992)

District Rule 4701 Internal Combustion Engines (Amended April 16, 1998)

For this facility the following conditions are based on the rules listed above and are not Federally Enforceable through Title V: condition 40 of the facility wide requirements, and conditions 10, 11 and 12 of the requirements for [unit -18](#).

IX. COMPLIANCE

A. Requirements Addressed by General Permit Templates

1. Gasoline Transfer System

The applicant is proposing to use a general permit template to address federally applicable requirements for the Gasoline Transfer System, N-0339-9. Section IV of template SJV-GS-2-0 includes a demonstration of compliance for applicable requirements. Template conditions have been added to the requirements for permit unit N-0339-9 as conditions 1 through 12 to assure compliance with these requirements. Template conditions referring to section 9 of Rule 2520 have been revised to reflect the current version of the rule, amended June 21, 2001.

2. Internal Combustion Engine

The applicant is proposing to use a general permit template to address federally applicable requirements for an Internal Combustion Engine, N-0339-11. Section IV of template SJV-IC-1-0 includes a demonstration of compliance for applicable requirements. Template conditions have been added to the requirements for permit unit N-0339-11 as conditions 1 through 11 to assure compliance with these requirements. Template conditions referring to section 9 of Rule 2520 have been revised to reflect the current version of the rule, amended June 21, 2001.

Template condition 6, requiring record keeping for units used less than 200 hours per year, has been subsumed and replaced by ATC condition 12, requiring record keeping of daily hours of operation, regardless of use hours.

B. Requirements Not Addressed by General Permit Templates

1. New and Modified Stationary Source Review Rule (District NSR Rule)

a. Facility Wide Requirements (N-339-0)

- Condition 1 is included as condition 22 of the facility wide permit.
- Condition 2 is included as condition 40 of the facility wide permit. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.

b. Miscellaneous Equipment (N-0339-1)

This permit unit was not subject to the District NSR Rule at the time it was installed. The unit was issued an In-house Permit to Operate (Inhouse PTO) as existing equipment. The unit was required to be permitted when the District Rule 2020 exemption levels changed.

c. Gasoline Dispensing (N-0339-9)

This permit unit was not subject to the District NSR Rule at the time it was installed. The unit was issued an In-house Permit to Operate (Inhouse PTO) as existing equipment. The unit was required to be permitted when the District Rule 2020 exemption levels changed.

- Conditions 1 through 4 from the PTO are included as conditions 5, 6, 1 and 2, respectively, of the permit template requirements for this permit unit.

d. Internal Combustion Engine (N-0339-11)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO is included as condition 12 of the requirements for this permit unit. This condition requires compliance with District Rule 4301.
- Conditions 2 through 6 from the PTO were included as condition 13 of the requirements for this permit unit. These conditions provide emission limits pursuant to District NSR Rule.
- Conditions 7, 8 and 9 from the PTO are included as conditions 14, 15 and 16 of the requirements for this permit unit. These conditions provide operational limits pursuant to District NSR Rule.
- Condition 10 from the PTO is included as condition 6 of the requirements for this permit unit. This condition requires record keeping pursuant to District NSR Rule and has replaced the less stringent permit template condition.
- Conditions 11 and 12 from the PTO are included as conditions 21 and 22 of the requirements for this permit unit. These conditions require record keeping pursuant to District NSR Rule.

e. Miscellaneous Equipment (N-0339-15, -16)

These permit units were not subject to the District NSR Rule at the time they were installed. The units were each issued an In-house Permit to Operate (Inhouse PTO) as existing equipment. The units were required to be permitted when the District Rule 2020 exemption levels changed.

- Condition 1 from the PTO is included as conditions 22, 33, 34 and 35 of the facility wide permit.

f. Municipal Solid Waste Landfill (N-0339-17)

This permit unit was not subject to the District NSR Rule at the time it was installed. The unit was issued an In-house Permit to Operate (Inhouse PTO) as existing equipment. The unit was required to be permitted when the District Rule 2020 exemption levels changed.

- Conditions 1 through 7 from the PTO are included as facility wide permit conditions 31 through 35.

g. Internal Combustion Engine (N-0339-18)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 from the PTO are included as conditions 8 and 9 of the requirements for this permit unit. These conditions require compliance with 40 CFR Part 89, Subpart A.
- Conditions 3, 4 and 5 from the PTO are included as conditions 10, 11 and 12 of the requirements for this permit unit. These conditions provide operational requirements pursuant to District Rule 4102.
- Conditions 6 through 10 from the PTO are included as conditions 13 and 14 of the requirements for this permit unit. These conditions provide operational limits pursuant to District NSR Rule.
- Condition 11 from the PTO is included as condition 15 of the requirements for this permit unit. This condition provides operational requirements pursuant to District Rule 4102.
- Condition 12 from the PTO is included as condition 16 of the requirements for this permit unit. This condition provides operational requirements pursuant to District NSR Rule.
- Conditions 13, 14 and 15 from the PTO are included as conditions 21, 22 and 23 of the requirements for this permit unit. These conditions require record keeping pursuant to District NSR Rule.

2. District Rule 1100 Equipment Breakdown (Non SIP replacement for San Joaquin County Rule 110)

District Rule 1100 has been submitted to the EPA to replace San Joaquin County rule 110 in the SIP. District Rule 1100 is at least as stringent as the county SIP rule addressing breakdowns, as demonstrated in Table 1.

Table 1 - Comparison of District Rule 1100 to San Joaquin County Rule 110

REQUIREMENTS	District Rule 1100	S. J. Rule 110
A breakdown occurrence must be reported as soon as reasonably possible but no later than 1 hour after detection.	X	X
A variance must be obtained if the occurrence will last longer than a production run or 24 hours, whichever is shorter (96 hours for CEM systems).	X	X
A report must be submitted to the APCO within 10 days of the correction of the breakdown occurrence which includes:	X	X
1) A statement that the breakdown condition has been corrected, together with the date of correction and proof of compliance.	X	X
2) A specific statement of the reason(s) or cause(s) for the occurrence sufficient to enable the APCO to determine whether the occurrence was a breakdown condition.	X	X
3) A description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future.	X	
4) Pictures of the equipment or controls which failed if available.	X	

Sections 6.0 and 7.0 set forth breakdown procedures and reporting requirements. These requirements are addressed by facility wide permit conditions 1, 2 and 11.

3. District Rule 1160 Emission Statements

Section 5.0 requires the owner or operator of any stationary source to provide the District with a written emission statement showing actual emissions of reactive organic gases (ROGs) and nitrogen oxides (NOx) from that source. [The District waives this requirement for sources emitting less than 25 tons per year of these pollutants if the District provides the Air Resources Board \(ARB\) with an emission inventory of sources emitting greater than 10 tons per year of NOx or ROGs based on the use of emission factors acceptable to the ARB.](#) See facility wide permit condition 3.

4. District Rules 2010 Permits Required and 2020 Exemptions (Non SIP replacement for San Joaquin County Rule 202)

District Rule 2010 sections 3.0 and 4.0 require any person building, modifying or replacing any operation that may cause the issuance of air contaminants to apply for an Authority to Construct (ATC) from the District in advance. The ATC will remain in effect until the Permit to Operate (PTO) is granted. These requirements are stated in facility wide permit condition 4.

District Rule 2020 has been submitted to the EPA to replace San Joaquin County rule 202. District Rule 2020 lists equipment that is specifically exempt from obtaining permits and specifies record keeping requirements to verify such exemptions. These requirements are stated in facility wide permit condition 4.

District Rule 2020 is at least as stringent as the corresponding county SIP rule, as demonstrated in Table 2.

Table 2 - Comparison of District Rule 2020 to San Joaquin County Rule 202

REQUIREMENTS	District Rule 2020	S. J. Rule 202
An ATC or PTO is not required for listed exempt equipment.	X	X
Conditions are stated under which listed exempt equipment will require an ATC or PTO.	X	
Record keeping is required to verify and maintain exemption, when the exemption is based on a maximum daily limitation.	X	
A compliance schedule is stated for equipment that loses exemption from permitting, necessitating submission of a PTO application.	X	

5. District Rules 2031 Transfer of Permits, 2070 Standards for Granting Applications and 2080 Conditional Approval

These rules set forth requirements to comply with all conditions of the Permit to Operate. Permits to Operate or Authorities to Construct are not transferable unless a new application is filed with and approved by the District. All source operations must be constructed and operated as specified in the Authority to Construct. See facility wide permit conditions 5 and 6.

6. District Rule 2040 Applications

Section 3.0 requires that every application for a permit shall be filed in a manner and form prescribed by the District. See facility wide permit condition 7.

7. District Rule 2520 Federally Mandated Operating Permits

Section 5.2 requires that permittees submit applications for Title V permit renewal at least six months prior to permit expiration. Facility wide permit condition 38 assures compliance with this requirement.

Section 9.0 of District Rule 2520 requires certain elements to be contained in each Title V permit:

Section 9.3 contains requirements for monitoring emissions. The permit shall include all analysis procedures or test methods by reference, periodic monitoring to provide reliable data (including record keeping), and requirements for installation, use and maintenance of monitoring equipment (as appropriate). These monitoring requirements are required of permit [unit -11](#) in permit conditions 17 through 22, of permit [unit -17](#) in permit condition 15, and of permit [unit -18](#) in permit conditions 4 through 7, and 17 through 20.

Section 9.4 contains requirements to incorporate all applicable record keeping requirements into the Title V permit, specific records of any required monitoring, and the retention of all required monitoring data and support information for five years. The requirements to keep specific monitoring records and retain records for five years are stated in [facility wide](#) permit conditions 8 and 9, respectively, and in condition 23 of the requirements for permit [unit -18](#).

Section 9.5 contains requirements for the submittal of reports of monitoring at least every six months and prompt reporting of deviations from permitting requirements, including those attributable to upset conditions. All required reports must be certified by the responsible official. These requirements are stated in [facility wide permit conditions 10 and 11. Condition 41 of the facility wide requirements indicates the issuance date, which signifies the beginning and anniversary of all reporting periods.](#)

Section 9.7 states that the Title V permit must also contain a severability clause in case of a court challenge; the severability clause is stated in facility wide permit condition 12.

Section 9.8 contains requirements for provisions in the Title V permit stating that 1) the permittee must comply with all permit conditions; 2) that the permitted activity would have to be reduced to comply with the permit conditions should not be a defense in an enforcement action, 3) that the permit may be revoked, modified, reissued, or reopened for cause, 4) that the Title V permit does not reflect any property rights, and 5) that the permittee will furnish the District with any requested information to determine compliance with the conditions of the Title V permit. Compliance with these sections of Rule 2520 is assured by facility wide permit conditions 5 and 13 through 16.

Section 9.9 contains the requirement to provide in the permit that the permittee pay annual permit fees and applicable fees from District Rules 3010, 3030, 3050, 3080, 3090, 3110, and 3120. This requirement is stated in facility wide permit condition 17.

Section 9.13.1 requires any report or document submitted under a permit requirement or a request for information by the District or EPA shall contain a certification by a responsible official to truth, accuracy, and completeness. Compliance with this section is assured by facility wide permit condition 28.

Section 9.13.2 contains inspection and entry requirements that allow an authorized representative of the District to enter a permittee's premises to inspect equipment, operations, work practices, permits on file, and to sample substances or monitor parameters for the purpose of assuring compliance with the permit requirements. Compliance with this section is assured by facility wide permit conditions 18, 19, 20 and 21.

Section 9.16 requires that the permittee submit certification of compliance with the terms and standards of Title V permits to the EPA and the District annually (or more frequently as required by the applicable requirement or the District). Facility wide permit condition 37 assures compliance with this requirement.

Section 10.0 requires any application form, report or compliance certification submitted pursuant to these regulations shall contain certification of truth accuracy, and completeness by a responsible official. Compliance with this section will be assured by facility wide permit condition 28.

8. District Rule 4002 National Emissions Standard for Hazardous Air Pollutants

There are applicable requirements from the National Emissions Standards for Hazardous Air Pollutants that apply to all sources in general. These requirements pertain to asbestos removal and disposal from renovated or demolished structures. Compliance is assured for these requirements by facility wide permit condition 36.

9. District Rule 4101 Visible Emissions (Non SIP replacement for San Joaquin County Rule 401)

District Rule 4101 has been submitted to the EPA to replace Rule 401 (all counties of the SJVUAPCD). EPA made a preliminary determination that District Rule 4101 is “more stringent” than the county versions previously referenced, per correspondence date August 20, 1996.

Section 5.0 prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer’s view to a degree equal to or greater than 20% opacity. This requirement is stated in facility wide permit condition 22.

10. District Rule 4301 Fuel Burning Equipment

Section 5.1 requires PM emissions to be limited to 0.1 grain per cubic foot of gas calculated to 12% carbon dioxide at dry standard conditions. Since maximum particulate emissions occur at 0% excess air, which may occur at operating CO₂ levels and dry standard conditions, the Rule limit is included as a condition 12 of the requirements of permit [unit –11](#).

11. District Rule 4601 Architectural Coatings

This rule limits the emissions of VOCs from architectural coatings. It requires limiting the application of coating to no more than 250 grams of VOC/liter of coating (less water and exempt compounds). It also forbids the use of coating from the list in the Table of Standards (section 5.2) and limits the use of Specialty Coatings to a VOC content not to exceed the specified limits in Table 1 of Rule 4601. This rule further specifies labeling requirements, coatings thinning recommendations, storage requirements and cleanup requirements. Compliance is assured by facility wide permit conditions 23, 24, 25, 26 and 27.

12. 40 CFR Part 60 Subpart Cc Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills

[Subpart Cc, Emission Guidelines, applies to this facility. However, the District does not have delegation of this Subpart. This facility is therefore subject to 40 CFR 62 Subpart GGG Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction Prior to May 30, 1991 and Have Not Been Modified or Reconstructed Since May 30, 1991.](#)

13. 40 CFR Part 60 Subpart WWW Standards of Performance for Municipal Solid Waste Landfills

Subpart WWW contains requirements applicable to existing MSWL, as referenced by 40 CFR 62, Subpart GGG. Compliance with these requirements is addressed as follows:

Section 60.752(a) and (b) contain requirements for submittal of initial and subsequent design capacity and NMOC emission reports. Conditions addressing submittal of the initial design capacity and initial NMOC emission rate reports to the APCO are not included in this evaluation. These requirements are extraneous, since landfills are required to submit these reports to the APCO, with their permit application for the

landfill. The submittal of amended design capacity reports is not required for these sources since they have design capacities above the limits of 2.5 million megagrams and 2.5 million cubic meters prior to any modification. Only landfills that undergo a modification to increase the design capacity above the 2.5 million megagrams and 2.5 million cubic meters limits will become subject to the NSPS for landfills, 40 CFR 60 Subpart WWW. Compliance with subsequent NMOC emission report submittal is assured by conditions 9 and 16 through 18 of the requirements for permit [unit -17](#) and is also required pursuant to sections 60.754(a) and 60.757(b).

Sections 60.753, 60.755 and 60.756 address operational standards, compliance provisions and monitoring of installed collection and control systems. These system specific requirements will become applicable once a gas collection and control system, pursuant to Part 62 Subpart GGG, is installed. Compliance is assured through conditions 18 and 19 for permit [unit -17](#).

Sections 60.754(a) and (c) contain test methods and procedures for calculating NMOC emission rates. Compliance is assured by permit conditions 1 through 9 for permit [unit -17](#).

Sections 60.754(b) and (d) contain requirements applicable to a MSWL after the installation of a collection and control system. Compliance with these requirements is assured by permit conditions 18 and 19 for permit [unit -17](#).

Section 60.757(a) addresses initial and subsequent design capacity report submittal. As already mentioned under 60.752(a) and (b), this section is not applicable to this source.

Sections 60.757(b), (c) and (d) address reporting requirements for NMOC emission rates and landfill closure reports. Compliance with these sections is assured by permit conditions 9 through 14 and 17 for permit [unit -17](#).

Sections 60.757(e), (f) and (g) address reporting requirements for controlled landfills. Compliance with these requirements is assured by permit conditions 18 and 19 for permit [unit -17](#).

Section 60.758, except section 60.758(a), contains record keeping requirements for a MSWL with collection and control system devices. Compliance with these requirements is assured by permit conditions 18 and 19 for permit [unit -17](#).

Section 60.758(a) addresses record keeping requirements for design capacity, solid waste in-place and waste acceptance rate. Compliance is assured by permit condition 15 for permit [unit -17](#).

Section 60.759 contains specifications for MSWL gas active collection systems. Compliance with any potential applicability of these requirements is assured by permit conditions 18 and 19 for permit [unit -17](#).

14. 40 CFR Part 62 Subpart GGG Federal Plan Requirements for Municipal Solid Waste Landfills...

This Subpart requires sources with capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters to perform periodic calculations and submit periodic reports, and comply with specific increments of progress when applicable. Should

the nonmethane organic compounds (NMOC) emission rate exceed 50 megagrams/year at an affected facility, the landfill is required to design and install a collection and control system, according to design plan submittal. Compliance with the requirements of this Subpart is addressed in the following manner:

Section 62.14352(e) requires affected MSWLs with design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters to be permitted under Title V. Compliance has been demonstrated by the facility's timely application submittal.

Section 62.14352(f) states that when MSWL is closed, the owner or operator is no longer subject to the requirement to maintain the Title V permit if either of the following conditions are met: 1) the landfill was never subject to the requirement to have a control system, pursuant to §62.14353 or 2) the owner or operator meet the conditions for control system removal, pursuant to §60.752(b)(2)(v). Permit conditions 16 and 17 for permit [unit -17](#) assure compliance with this requirement.

Section 62.14353 requires collection and control systems meet certain design requirements. Permit conditions 18 and 19 for permit [unit -17](#) assure compliance with these requirements.

Section 62.14354(a) states that the NMOC emission rate be calculated using the values and procedures in 40 CFR 60.754 to determine if emissions equal or exceed 50 megagrams/yr. Refer to the compliance discussion under Subpart WWW for compliance with these requirements.

Section 62.14354(b) states that a collection and control system must meet the operational standards in 40 CFR 60.753; a controlled landfill must meet the compliance provision in 40 CFR 60.755 and the monitoring provision in 40 CFR 60.756. Permit conditions 18 and 19 for permit [unit -17](#) assure compliance with these requirements. Once the collection and control system is installed at affected facilities, compliance with system specific requirements will be addressed through modification of the permit.

Section 62.14355 states that record keeping and reporting provisions in sections 60.757 and 60.758 shall be followed. Refer to the compliance discussion under Subpart WWW for compliance with these requirements. This section also requires reporting for each increment of progress and is addressed by permit condition 20 of permit [unit -17](#).

Sections 62.14356 address compliance times and increments of progress for installation of a collection and control system at a MSWL whose emissions have exceeded 50 megagrams/yr. Compliance with this section is assured by permit conditions 21 through 26 for permit [unit -17](#).

15. 40 CFR Part 82 Subpart F Stratospheric Ozone

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources in general. These requirements pertain to air conditioners, chillers and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC). Compliance is assured for these requirements by facility wide permit conditions 29 and 30.

16. 40 CFR Part 89 Subpart A Control of Emissions From New and In-Use Nonroad Engines

Performance specifications for new nonroad engines are identified in this subpart and are applicable to transportable engines. Compliance with this regulation is assured by conditions 8 and 9 of the requirements of [unit -18](#).

17. SJVUAPCD Regulation VIII (District Rules 8020, 8030, 8040, 8060 and 8070) - Fugitive Dust (PM₁₀)

These regulations contain requirements for the control of fugitive dust. These requirements apply to various sources: construction (including road construction), demolition, excavation, extraction, and water mining activities; outdoor storage piles; paved and unpaved roads; and landfill disposal sites. Compliance with these regulations is assured by facility wide permit conditions 31 through 35, formerly on the permit to operate for [unit -17](#).

X. PERMIT CONDITIONS

See permit conditions on the following pages.

Attachment A

Detailed Facility Printout

Attachment B

Insignificant Activities

Title V Application - INSIGNIFICANT ACTIVITIES

COMPANY NAME: Forward Landfill			FACILITY ID: N-0339		
Check the box next to the exemption category from Rule 2020 which describes any insignificant activity or equipment at your facility not requiring a permit.					
Exemption Category	Rule 2020 Citation	√	Exemption Category	Rule 2020 Citation	√
Structure or incinerator assoc. with a structure designed as a dwelling for 4 families or less	4.1		Containers used to store refined lubricating oils	6.6.8	√
Locomotives, airplanes, and watercraft used to transport passengers or freight	4.4		Unvented pressure vessels used exclusively to store liquified gases or assoc with exempt equipment	6.6.9 or 6.13	
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less	6.1.1	√	Portable tanks used exclusively to store produced fluids for ≤ six months	6.6.10	
Piston-type i.c. engine with maximum continuous rating of 50 braking horsepower (bhp) or less	6.1.2	√	Mobile transport tanks on delivery vehicles of VOCs	6.6.11	√
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less	6.1.3		Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥ 0.8251	6.7.1.1	
Space heating equipment other than boilers	6.1.4	√	Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762	6.7.1.2	
Cooling towers with a circulation rate less than 10,000 gal/min, and that are not used for cooling of process water, or water from barometric jets or condensers++	6.2		Equipment used exclusively for the transfer of refined lubricating oil	6.7.2	√
Use of less than 2 gal/day of graphic arts materials	6.3		Equipment used to apply architectural coatings	6.8.1	√
Equipment at retail establishments used to prepare food for human consumption	6.4.1		Unheated, non-conveyorized cleaning equipment with < 10 ft² open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr. evaporative losses	6.9	√
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by sec. 6.1.1	6.4.3		Brazing, soldering, or welding equipment	6.10	√
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plastisizer or blowing agent is used	6.5		Equipment used to compress natural gas	6.11	
Containers used to store clean produced water	6.6.1		Fugitive emissions sources assoc. with exempt equipment	6.12	√
Containers ≤ 100 bbl used to store oil with specific gravity ≥ 0.8762	6.6.2	√	Pits and Ponds as defined in Rule 1020	6.15	
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity ≥ 0.8762	6.6.3		On-site roadmix manufacturing and the application of roadmix as a road base material	6.17	
Containers with a capacity ≤ 250 gallons used to store organic material where the actual storage temperature < 150 F	6.6.4	√	Emissions less than 2 lb/day from units not included above	6.19	√
Containers used to store unheated organic material with an initial boiling point ≥ 302 F*	6.6.5	√	Venting PUC quality natural gas from for sole purpose of pipeline and compressor repair and or maintenance	7.2	
Containers used to store fuel oils or non-air-blown asphalt with specific gravity ≥ 0.9042	6.6.6		Non-structural repairs & maintenance to permitted equipment	7.3	√
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251	6.6.7	√	Detonation of explosives ≤ 100 lb/day and 1,000 lb/year	7.4	

☐ No insignificant activities (Check this box if no equipment in the above categories exist at your facility.)

Attachment C

Current Permits

Attachment D

EPA Comments / District Response

EPA COMMENT / DISTRICT RESPONSE

The EPA did not submit comments on this project.

Attachment E

Public Comments / District Response

PUBLIC COMMENT / DISTRICT RESPONSE

Public comments were received from Forward Incorporated (Forward) regarding the proposed Title V Operating Permit for Forward Landfill (District facility #N-339). These comments are encapsulated below followed by the District's response. A copy of Forward Landfill's 2/21/2002 comment letter is available at the District.

1. FORWARD COMMENT — PERMIT –0, CONDITIONS 1 AND 2

It is Forward's understanding that an equipment failure that resulted in the shut down of the system does not meet the intent of a "breakdown condition" since the amount of emissions generated would not increase, and may, under some circumstances, reduce the amount of emissions produced. Therefore, Forward requests that the District confirm that a breakdown condition does not exist unless the shut down of the equipment causes excess emissions.

District Response

A breakdown condition, as defined in District Rule 1100, Equipment Breakdown, Section 3.1 (Amended December 17, 1992), exists if any part of a permit unit is not operating as it is expected to by the permit conditions, regardless increase or decrease in actual emissions.

2. FORWARD COMMENT — PERMIT –0, CONDITION 10

This condition indicates that reports of any required monitoring shall be submitted, however, it does not specify the reporting schedule or the form in which the report should be submitted. The condition should be revised to specify the reporting schedule.

District Response

Unless otherwise specified by specific permit requirements or arranged with the Compliance Division, the District bases report due dates upon the anniversary date of initial issuance of the permit (typically within 30 days of this anniversary), refer to condition [41 of the facility wide permit](#). Each permit condition includes rule reference to assist facilities in determining the reporting requirements of each permit unit. The District has forms for reporting (TV-006 and TV-007) which are available at the nearest District office or at the District's website (www.valleyair.org). The District may consider other reporting formats on a case-by-case basis. This condition will not be modified.

3. FORWARD COMMENT — PERMIT –0, CONDITIONS 18 THROUGH 21

Forward suggests that these conditions be revised to include "use of proper protective equipment," in addition to the proper credentials as conditions for site entry.

District Response

All staff at the District must adhere to District **and** facility safety guidelines while performing site visits or site inspections. Forward has the right to refuse entry to any District personnel if they do not have appropriate attire. The permit conditions will not be modified.

4. FORWARD COMMENT — PERMIT –0, CONDITION 22

This condition references District Rule 4101's 20% opacity limit, and is contradictory to the 40% opacity limit identified in Regulation VIII requirements. It is Forward's understanding that Rule 4101 applies to point sources of emissions and Regulation VIII applies to fugitive dust sources. Please revise this condition to clearly state that Rule 4101 is applicable to non-fugitive sources of particulate matter.

District Response

Condition 22 includes all Rule 4101 exemptions by reference, including Section 4.11, which specifically exempts emissions subject to or specifically exempt from Regulation VIII. The permit condition does not need to be revised.

5. FORWARD COMMENT — PERMIT –0, CONDITIONS 23 THROUGH 27

Forward proposes that the phrase "...unless specifically exempted under District Rule 4601" be added to the end of the conditions. If Rule 4601 is not SIP-approved, the EPA has not approved the exemptions, and may not allow the exemptions included in the rule.

District Response

Prior to issuance of the preliminary decision, the District added the phrase "...unless exempted under section 4.0 of District Rule 4601 (Amended 9/17/97)" to each of the above mentioned conditions.

6. FORWARD COMMENT — PERMIT –0, CONDITION 31

Forward would like to state for the record that District Rule 8020 applies only to the "initial construction of landfills prior to commencement of landfill operations;" and would not apply to the ongoing operation of a landfill. Potential fugitive dust emissions, which occur during the operation of a landfill, are subject to District Rule 8040 (conditions 33 and 35 of the permit).

7. FORWARD COMMENT — PERMIT –0, CONDITION 32

Forward would like to state for the record that District Rule 8030, upon which this condition is based, was not written for landfill sites. Compliance with this rule and this condition may be most appropriately handled through an alternative compliance plan, as allowed under Section 6.0.

8. FORWARD COMMENT — PERMIT –0, CONDITION 35

Forward does not feel it is the intent of rule [8070] to regulate "areas" that are transient in nature or areas that do not have defined boundaries. To avoid confusion and potential future compliance issues, Forward proposes that this condition be revised to state that "the owner or operator of all permanent areas of one acre or greater...shall comply with the provisions of Rule 8070."

District Response

Rule 8070 does not identify any difference between transient or permanent areas, only areas larger or smaller than one acre. The current permit condition correctly reflects the rule requirement.

9. FORWARD COMMENT — PERMIT –17, CONDITION 3

There are several variations of Tier 2 testing protocols that are not spelled out in this condition, but are contained within 40 CFR 60.754. Condition 3, as written, limits the manner in which Tier 2 testing can be conducted at these landfills in the future. Industry has come to the realization that site-specific variations of Tier 2 testing protocols are sometimes appropriate. As such, Forward proposes that condition 3 be reworded as follows:

Tier 2 specifications to determine the site-specific NMOC concentration shall be conducted in accordance with 40 CFR 60.754(a)(3) and/or any other methodology approved by the District or the EPA.

District Response

The current condition on the proposed Title V permit includes what you are requesting and reads as follows:

Tier 2 specifications to determine the site-specific NMOC concentration shall include the following: 1) For sampling, at least 2 sample probes shall be installed per hectare of landfill surface that has retained waste for at least 2 years, up to a maximum of 50 required probes. One sample of landfill gas shall be collected from each probe to determine the NMOC concentration, using EPA Method 25, 25C, another method approved by the EPA, or 18, in accordance with 40 CFR 60.754(a)(3). If EPA Method 18 is used, the minimum list of compounds to be tested shall be those published in the most recent compilation of AP-42. If composite sampling is used, equal sample volumes are required. All samples taken shall be used in the analysis. The NMOC concentration from Method 25 or 25C shall be divided by 6 to convert from C-NMOC, as carbon to as hexane. 2) For landfills equipped with active collection systems, samples may be collected from the common header pipe before gas moving or condensate removal equipment; a minimum of 3 samples must be collected. [40 CFR 60.754(a)(3), (a)(5) and 62.14354]

10. FORWARD COMMENT — PERMIT –17, CONDITION 6

Forward has the same comments pertaining to this condition as we do for condition 3. Forward proposes that condition 6 be reworded as follows:

Tier 3 specifications to determine the site-specific methane generation rate constant shall be conducted in accordance with 40 CFR 60.754(a)(4) and/or any other methodology approved by the District or the EPA.

District Response

The current condition on the proposed Title V permit includes what you are requesting and reads as follows:

Tier 3 specifications to determine the site-specific methane generation rate constant shall include the following:

1) EPA Method 2E or another method approved by the EPA shall be used, 2) The NMOC mass emission rate shall be recalculated using the average site-specific NMOC concentration and the site-specific methane generation rate constant k, instead of the default values in 40 CFR 60(a)(1), and 3) If the resulting calculated NMOC mass emission rate is equal to or greater than 50 megagrams/year, the landfill owner or operator shall comply with 60.752(b)(2). [40 CFR 60.754(a)(4), (a)(5) and (i) and 62.14354]

11. FORWARD COMMENT — PERMIT –1, CONDITION 13

Forward proposes that condition 13 be revised to allow submittal of Tier 2 reports beyond the 180-day deadline.

District Response

The District believes that the EPA may have allowed submittal of “late” Tier 2 reports; the District also believes that the EPA may continue to allow “late” submittal of Tier 2 reports. However, the permit must reflect the language of the underlying applicable requirement. The District cannot revise condition 13.

12. FORWARD COMMENT — PERMIT –17, CONDITION 14

Forward proposes that condition 14 be revised to allow submittal of Tier 3 reports beyond the one-year deadline.

District Response

The District believes that the EPA may have allowed submittal of “late” Tier 3 reports; the District also believes that the EPA may continue to allow “late” submittal of Tier 3 reports. However, the permit must reflect the language of the underlying applicable requirement. The District cannot revise condition 14.

13. FORWARD COMMENT — PERMIT –17, CONDITION 16

Condition 16 should be revised to properly incorporate the requirements of 40 CFR 60.752(d).

District Response

The current condition on the proposed Title V permit includes what you are requesting and reads as follows:

This operating permit may be cancelled with APCO approval when the landfill is closed, pursuant to the requirements of this permit, if the landfill is not otherwise subject to the requirements of either 40 CFR part 70 or part 71 and if either 1) it was never subject to the requirement for a control system under 40 CFR 60.752(b)(2); or 2) the owner or operator meets the conditions for control system removal specified in 40 CFR 60.752(b)(2)(v). [40 CFR 60.752(d) and 62.14352(f)]

14. FORWARD COMMENT — PERMIT –17, CONDITION 17

Forward does not believe that it is appropriate for an air quality permit to require closure of a landfill in accordance with a non-air regulation.

District Response

Title V is designed to ensure compliance with all aspects of CFR, this requirement is to ensure that critical control equipment is not inadvertently removed prior to completion of specific procedural requirements. Furthermore, the permit must reflect the language of the underlying applicable requirement, in this case, 40 CFR 60.757(d).

15. FORWARD COMMENT — PERMIT –17, CONDITION 22

This condition may be redundant with condition 18, and could cause future confusion. Therefore, Forward requests removal of either condition from the permit.

District Response

The District recognizes that conditions 18 and 22, on previous draft versions of the proposed initial Title V operating permit, were similar, and has previously removed the redundant condition.

16. FORWARD COMMENT — INSIGNIFICANT ACTIVITIES

Forward would like to add the following insignificant activities to those previously marked on TVFORM-003: Equipment used exclusively for the transfer of refined lubricating oil (Rule 2020, 6.7.2), and Equipment used to apply architectural coatings (Rule 2020, 6.8.1).

District Response

The District will update TVFORM-003 per your request.

17. FORWARD COMMENT — ALTERNATE COMPLIANCE PLANS

Many District Rules contain provisions for the filing of alternative compliance plans. Forward proposes that a generic condition be added to the permit that would allow the use of alternative compliance plans.

District Response

If special conditions exist which will unreasonably prevent compliance with a District Rule, and the rule allows alternative compliance plans, Permittee may submit and request approval of an Alternative Compliance Plan in accordance with the appropriate section of that District Rule.

Title V Facility Contacts

Created On (Date): 26 November 2001

For (Facility name): Forward, Inc., Forward Landfill
(DBA ID Number): N-0339

By (District Staff Person): Douglas Shaffer

Based on Information Provided by: Initial Application Data

Responsible Official

Name: Lawrence Butch Stefani
Title: Landfill Operations Manager
Telephone: (209) 982-4298
Address: Forward, Incorporated
9999 S Austin Road
Manteca, CA 95336

Contacts for Questions Regarding Application

Name: Curt Fuji
Title: Project Manager
Telephone: (925) 458 9800
FAX: (925)

Send Draft Permits to:

Name: Curt Fuji
Title: Project Manager
Telephone: (925) 458 9800
FAX:
Address: Forward, Incorporated
1145 W Charter Way
Stockton, CA 95206

Send Proposed and Final Permits to:

Name: Lawrence Butch Stefani
Title: Landfill Operations Manager
Telephone: (209) 982-4298
FAX:
Address: Forward, Incorporated
9999 S Austin Road
Manteca, CA 95336

Engineer Name	Douglas Shaffer
Engineer Initials	<Engineer's Initials>
Review Manager	Richard McVaigh
Facility's Regional Manager	Jim Swaney
Facility Name	Forward Incorporated, Forward Landfill
Facility #	N-339
Project #	N-990167
Operation Description	Municipal Solid Waste Landfill
Location	near Manteca
	The following should make sense: This is for its Municipal Solid Waste Landfill near Manteca, California.
Contact Receiving Final	Lawrence Butch Stefani
Greeting Name	Mr. Stefani
Mailing Address	9999 S Austin Road Manteca, CA 95336
Newspaper	Stockton Record
Did EPA have objections?	No
Were there any comments?	Yes
Preliminary Notice Date	March 14, 2002

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St.
San Francisco, CA 94105

**Re: Notice of Final Action - Title V Permit
District Facility # N-339
Project # N-990167**

Dear Mr. Rios:

The District has issued the Final Title V Permit for Forward Incorporated, Forward Landfill. The preliminary decision for this project was made on March 14, 2002. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. We appreciate your concurrence with this action. Should you have any questions, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900.

Sincerely,

Seyed Sadredin
Director of Permit Services

Attachments

C: Douglas Shaffer, Permit Services Engineer

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
2020 L St.
Sacramento, CA 95812-2815

**Re: Notice of Final Action - Title V Permit
District Facility # N-339
Project # N-990167**

Dear Mr. Tollstrup:

The District has issued the Final Title V Permit for Forward Incorporated, Forward Landfill. The preliminary decision for this project was made on March 14, 2002. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. Should you have any questions, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900.

Sincerely,

Seyed Sadredin
Director of Permit Services

Attachments

C: Douglas Shaffer, Permit Services Engineer

Lawrence Butch Stefani
Forward Incorporated, Forward Landfill
9999 S Austin Road
Manteca, CA 95336

**Re: Notice of Final Action - Title V Permit
District Facility # N-339
Project # N-990167**

Dear Mr. Stefani:

The District has issued the Final Title V Permit for Forward Incorporated, Forward Landfill. The preliminary decision for this project was made on March 14, 2002. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900.

Sincerely,

Sayed Sadredin
Director of Permit Services

Attachments

C: Douglas Shaffer, Permit Services Engineer

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT
NOTICE OF FINAL DECISION TO ISSUE
FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue the initial Federally Mandated Operating Permit to Forward Incorporated, Forward Landfill for its Municipal Solid Waste Landfill near Manteca, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-990167, is available for public inspection at the District office at the address below. For additional information regarding this matter, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900, or contact Seyed Sadredin, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.

TITLE V PUBLIC NOTICE CHECKLIST

FACILITY ID: N-339 **PROJECT #:** N-990167

✓ ✓
REQST. COMPL.

- ☐ ☐ Title V PRELIMINARY PUBLIC NOTICE
- ☐ ☐ Title V REVISED PROPOSED PUBLIC NOTICE
- ✓ ☐ Title V FINAL PUBLIC NOTICE
- ☐ ☐ Title V MODIFICATION PUBLIC NOTICE

ENCLOSED DOCUMENTS REQUIRE:

- ✓ ☐ Stamp current date on all letters and signature page of the evaluation.
- ✓ ☐ Send **FINAL** notice letters to CARB, EPA and applicant including the following attachments:
 - ✓ Engineering evaluation with attachments.
 - ✓ Public notice
- ✓ ☐ Send **FINAL** public notice for publication to: Stockton Record.
- ✓ ☐ Send signed copies of all **FINAL** notice letters, engineering evaluation with attachments, and public notice to the following:
 - ✓ Douglas Shaffer, Permit Services Engineer
 - ✓ Jim Swaney, Permit Services Manager
- ✓ ☐ Enter "Mail Date" onto project record.
- ✓ ☐ Attach Compliance Assistance Bulletin "Title V Reporting Requirements" to the facility mailing.
- ✓ ☐ Email Chay Thao Engineering Evaluation.
- ☐ ☐ Other special instructions: _____

Date completed: June 4, 2002 By: Douglas Shaffer

San Joaquin Valley Air Pollution Control District

Final Engineering Evaluation

**Facility # N-339
Forward Incorporated, Forward Landfill**

PREPARED BY:

**Douglas Shaffer
Air Quality Engineer**

REVIEWED BY:

**Richard McVaigh
Permit Services Manager**

APPROVED BY:

**Sayed Sadredin
Director of Permit Services**

FINAL DECISION DATE:
